

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

ANNUAL COMPLIANCE REVIEW, 2020

Docket No. ACR2020

RESPONSES OF THE UNITED STATES POSTAL SERVICE TO
QUESTIONS 1-11 OF CHAIRMAN'S INFORMATION REQUEST NO. 15

The United States Postal Service hereby provides its responses to the above-listed questions of Chairman's Information Request No. 15, issued on February 11, 2021. Each question is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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1. In the *FY 2020 Report*, the Postal Service states that it missed its Deliveries per Total Workhours, Percent Change (DPTWH % Change) target "due to overrunning the work hour plan." *FY 2020 Annual Report* at 52.
 - a. Please explain in detail why workhours were overrun relative to plan in FY 2020.
 - b. Please identify any plans to avoid workhour overruns in FY 2021 and future years.

RESPONSE:

a. Plan workhour targets are set based on historical workhour usage and volume projections. As a result of the COVID-19 pandemic, the Postal Service experienced unprecedented variances in these volume projections as well as decreased employee availability. Scheduling and planning were impacted by the need to adhere to new CDC social distancing policy and guidelines. Package volume increased, leading to a relatively higher rate of manual processing over automation, which in turn imposed a relatively higher unit cost. Moreover, such packages may require delivery to the customer's door; they may also occupy a relatively greater share of space capacity in processing plants, transportation vehicles, and delivery units. These factors in combination further lowered the Deliveries per Total Workhour indicator.

It may be noted that, while the workhour targets are adjusted in an effort to take account of changes in mail volume and mail mix, the dramatic transformation from the previously prevailing operating environment to the pandemic environment may have rendered the adjustment mechanism employed less apt to fully achieve that objective.

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b. The Postal Service is committed to matching workhours to workload across all functions. Operational reviews are being made across the organization to capture any identified inefficiencies or opportunities for improvement.

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2. The Postal Service states that “a package usually contributes much more to workload than a letter or flat[.]” *Id.*
- a. Please explain how packages contribute more to workload than letters and flats and describe the impacts of increased package volumes experienced in FY 2020 on the FY 2020 DPTWH % Change result.
 - b. For each impact identified in response to question 2.a., please provide quantitative support and identify the metric(s) used. If quantitative support is unavailable for an identified impact, please explain why it is unavailable and provide qualitative analysis in support of the identified impact.

RESPONSE:

- a. Letters and flats are more uniform in shape and size and have strict requirements in terms of overall dimensions. This allows the Postal Service to automate their sortation, transportation, and delivery. By contrast, packages may require one-by-one manual processing, especially if they are oversized. Packages may also occupy more space in vehicles, satchels, and facilities; may require additional trips and/or handling; and may require deviation from fixed delivery points—such as mailboxes or cluster box units—to the customer's door, thus incurring additional delivery time.
- b. Quantitative data of this kind are not practical to collect in any known or reasonable scale.

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3. In the *Analysis of the Postal Service's FY 2019 Annual Performance Report and FY 2020 Performance Plan*, the Commission recommended that "the Postal Service focus on balancing its work complement to minimize the use of penalty overtime workhours to the greatest extent possible" and that it "take steps to address the occurrence of unauthorized overtime workhours."¹
- a. Please provide the planned overtime, unauthorized overtime, and penalty overtime workhours for FY 2020, along with the results. If the results exceeded what was planned, please describe in detail the reasons why.
 - b. Please describe any steps that the Postal Service took to minimize the use of penalty overtime workhours in FY 2020.
 - c. Please describe any steps that the Postal Service took to address the occurrence of unauthorized overtime workhours in FY 2020.
 - d. Please identify the operations that contributed the most to the total overtime workhours in FY 2020, quantify their respective contributions, and describe in detail the reasons for such contributions.

RESPONSE:

- a. Below is the planned and actual overtime and penalty overtime for FY 2020.

Please note that total overtime includes penalty overtime. The Postal Service does not plan for unauthorized overtime levels. Unauthorized overtime accounts for 23,659,159 of the total overtime hours used in FY 2020.

	Actual	Plan	FY
TOTAL OVERTIME	149,839,172	121,129,697	2020
TOTAL Penalty Overtime	16,959,517	8,868,427	2020

¹ Docket No. ACR2019, Postal Regulatory Commission, *Analysis of the Postal Service's FY 2019 Annual Performance Report and FY 2020 Performance Plan*, June 1, 2020, at 91 (FY 2019 Analysis).

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The Postal Service is committed to minimizing costs by using the appropriate mix of workhours based on complement and the assessment of relative cost for each workhour type. In some instances, the usage of overtime or even penalty overtime may be necessary to meet service commitments or to serve as a more cost effective option than if straight-time were used; in some cases, the cost of an overtime hour is less than the cost of a straight-time hour due to benefits and the flexibility offered by overtime.

The COVID-19 pandemic has significantly impacted employee availability while also leading to an increase in package volumes. In order to maintain service, the Postal Service has deployed several staffing strategies, including the hiring of additional non-career employees and utilizing overtime. The amount of overtime needed to react to the conditions caused by the pandemic could not have been foreseen when the targets were set.

b. The Postal Service has addressed the usage of overtime, including penalty overtime, by converting thousands of non-career employees to career status. This will reduce the amount of overtime used while continuing to meet service obligations. In addition, the Postal Service is creating an individualized operating plan for each facility, to include complement and overtime levels.

c. The Postal Service has strived to limit unauthorized overtime through the use of the Informed Visibility Employee Scheduler application. This tool compels facilities to plan ahead when scheduling full-day overtime and provides metrics on budget compliance, productivity, and overtime rates. The Postal Service is building a new complement model on this platform to reduce costs and provide for a single planning

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tool for complement and weekly schedules, to include scheduling of full-day overtime.

Postal regulations continue to stipulate that unauthorized overtime be recorded on Form 1017-B.

d. Below is the planned and actual overtime for FY 2020 by function.

Function 2 (delivery operations) contributed the most to the total overtime workhours in FY 2020 due to its greatest share of total workhours. The increased package volume caused by the pandemic has led to increased deliveries and dismounts, which have a disproportionate effect on carrier workhours compared to letter and flat volumes.

OT Function	Actual	Plan	Variance to Plan	% to Plan
F0	255,005	219,256	35,749	16.3%
F1	31,260,326	23,579,049	7,681,277	32.6%
F2	86,041,773	70,633,362	15,408,411	21.8%
F3	11,444,991	9,975,782	1,469,209	14.7%
F4	19,441,257	15,624,182	3,817,075	24.4%
F5	66,961	72,406	(5,445)	-7.5%
F6	136,950	104,594	32,356	30.9%
F7	598,153	483,031	115,122	23.8%
F8	584,025	438,035	145,990	33.3%

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4. In the *FY 2020 Annual Report*, the Postal Service states that it “established a COVID-19 Supplies Command Center to ensure that Postal Service facilities had adequate supplies to keep employees safe and meet ongoing facility cleaning needs throughout the pandemic.” *FY 2020 Annual Report* at 20. Please provide the total expenses incurred by the COVID-19 Supplies Command Center in FY 2020 and to date in FY 2021.

RESPONSE:

Under the Postmaster General's direction, a full-time Incident Command Center was established on March 20, 2020, to ensure a coordinated and effective Postal Service-wide response to the COVID-19. This team was established to ensure that the Postal Service was taking into account the appropriate response and proactive measures to reduce the impacts of the Pandemic as it related to Employee Response, Operational Continuity, Business Continuity, Customer Continuity and overall Communications. The team was led by four Vice Presidents and a number of subject matter experts.

The COVID-19 Supplies Command Center was a part of this effort. It was staffed with employees in the Supply Management and Marketing and Sales organization. It was a virtual group that established an Outlook account and a dedicated phone hotline number to support Postal Service facilities, COVID-19 supplies ordering, and inventories. The Command Center was dissolved when field inventories grew, and hotline calls dissipated as normal supply chain eBuyPlus ordering from suppliers and the Topeka MDC were processed.

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The Postal Service did not track the cost of the command center itself as this was absorbed by its internal personnel. However, the Postal Service tracked the Supplies and Services impact of COVID-19, including personal protective equipment, through an emergency finance number. For FY 2020, the Postal Service spent \$228M on COVID-19 related supplies and services. Year to date through December 2020, the Postal Service has spent an additional \$28M on COVID-19 related supplies and services.

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5. The Postal Service states that “[r]evenue from Shipping and Packages for FY 2020 was \$28.5 billion, \$4.9 billion more than the planned amount, due to the surge in volumes resulting from the pandemic.” *Id.* at 48. Please explain in detail how this increase is attributed directly to COVID-19, as opposed to other causes. In the response, please provide quantitative support and identify the metric(s) used. If quantitative support is unavailable, please explain why and provide qualitative analysis in support of this claim.

RESPONSE:

If the intent of the question is to probe whether the Postal Service is attempting to assert that, but for the pandemic, revenue for Shipping and Packages would have been *exactly* as projected in the plan (and therefore any deviation is *entirely* due to the pandemic), the Postal Service can confirm that, every year, multiple factors can and do contribute to the discrepancy between planned and actual revenue. Nevertheless, it would seem to be beyond cavil that the overwhelming majority of the discrepancy in FY 2020 was related to the pandemic. To the extent deemed useful, two sets of quantitative information support this conclusion. The first is a table of monthly volume figures that show a surge in volume (expressed as SPLY percentages) beginning precisely at the time in the spring of 2020 when the pandemic was declared.

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<u>Change in Volume over Same Period</u>			
<u>Last Year (SPLY): Total Competitive</u>			
<u>Products</u>			
	<u>2019</u>	<u>2020</u>	
January	5.9%	-3.4%	
February	0.2%	1.7%	
March	-4.8%	8.5%	
April	2.3%	35.0%	
May	-4.0%	61.1%	
June	-7.0%	71.4%	
July	-0.9%	50.7%	
August	-5.0%	39.5%	
September	-0.7%	36.1%	
October	-3.6%	29.0%	
November	- 12.9%	37.0%	
December	3.1%	22.1%	
<i>Source: Monthly Preliminary Financial Reports to the Commission</i>			

This shows that, within FY 2020, the surge to be explained coincides with the onset of the pandemic. Moreover, Census Bureau data confirm that this surge also coincides with a spike in e-Commerce sales:

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Postal Quarters	% Change vs SPLY
	E-commerce sales
2018PQ1	16.4
2018PQ2	15.5
2018PQ3	14.2
2018PQ4	13.2
2019PQ1	11.0
2019PQ2	11.8
2019PQ3	13.8
2019PQ4	17.3
2020PQ1	16.6
2020PQ2	14.8
2020PQ3	44.5
2020PQ4	36.7

Abundant media reports indicated that consumers were eschewing in-person shopping and replacing those purchases with items delivered to their homes. This widespread phenomenon affected all delivery companies, and the Postal Service was no exception.

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6. The Postal Service explains that "Total Factor Productivity (TFP), Labor Productivity and other operational productivity measures will continue to be monitored *internally* to drive real-time performance" after FY 2020. *Id.* at 52 (emphasis added).
- a. Please describe how the Postal Service intends to internally monitor TFP, Labor Productivity and the other operational productivity measures referenced, and explain how such internal monitoring will be used to drive real-time performance.
 - b. Please explain whether the Postal Service intends to continue reporting TFP and Labor Productivity in FY 2021 and beyond in the annual performance plan and annual performance report. If not, please explain.

RESPONSE:

- a. The Postal Service will internally monitor the results of TFP, Labor Productivity, and other operational measures through its normal reporting and analysis process. Based on the review of performance and productivity results, this information is provided to the operational functions to make adjustments as needed to increase productivity based on operational drivers.
- b. The Postal Service intends to continue reporting TFP and Labor Productivity in FY 2021 and beyond in the annual performance plan and annual performance report.

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7. The Postal Service states that “[in] FY 2020, labor productivity increased 0.2 percentage point[s], marking the tenth time in the last eleven years that USPS labor productivity has been positive.” *Id.* at 53.
- a. Please explain how labor productivity rose in FY 2020 despite the effects of the COVID-19 pandemic on its labor force, including the need to bring in non-career employees.
 - b. Please explain the impact of the increased package volumes experienced in FY 2020 on labor productivity during that same period.

RESPONSE:

a. Please note that the Postal Service recently received the revised, post-RCA TFP results, and Labor Productivity changed to a flat 0.0 percent for FY 2020 from the original +0.2 percent reported in the Annual Report to Congress. The explanation below refers to the 0.0 percent result in Labor Productivity.

Labor Productivity is the difference between Labor Input and Workload Output. In FY 2020, Labor Input was flat (growth rate of 0.0 percent). Labor Input is different from hours in that not all hours are considered equivalent. Hours worked by experienced employees generate more Labor Input. In FY 2020, the hours growth was largely offset by a compositionally less experienced set of workers. Recent hiring of employees would contribute towards this effect.

On the Output side, Workload increased by 0.1 percent in FY 2020, despite the drop in total pieces. This occurred for two reasons. The first was the compositional shift of mail towards categories such as Parcel Select and other packages. Because packages are higher cost, their delivery generates more output than many other categories of mail. While total pieces of mail declined significantly in FY 2020, the

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compositional shift towards higher cost mail categories such as packages meant that Weighted Mail Volume only declined by 0.4 percent.

The second reason Workload increased is due to the Network component. Workload is the weighted average of growth from three categories of output. Weighted Mail Volume was 59 percent of Workload in FY 2020; Miscellaneous output was 4 percent of Workload in FY 2020; and Network was 37 percent of Workload in FY 2020. Network delivery points grew by 1 percent in FY 2020. The weighted average of these three categories meant that workload increased by 0.1 percent in FY 2020.

Workload growth minus labor input growth yields labor productivity. Due to rounding, the difference in FY 2020 was 0.0 percent.

b. Please see the response to Question 7a above. Because packages are higher cost, their delivery generates more output than many other categories of mail.

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8. The Postal Service states that, for purposes of TFP, “[w]ork completed depends on three primary components: the number of delivery points, mail volume weighted by product type and miscellaneous output (such as other services the organization provides, including passport services).” *Id.* Please explain the impact of the increased package volumes experienced in FY 2020 on TFP during that same period.

RESPONSE:

As discussed above, the compositional shift towards packages in FY 2020 had a major impact on TFP. Packages are a component of Weighted Mail Volume (the other two as mentioned in the question are Miscellaneous Output and Network). Because packages are higher cost than other types of mail, their delivery generates more output than many other categories of mail. While the total pieces of mail declined significantly in FY 2020, the compositional shift towards higher cost mail categories such as packages meant that Weighted Mail Volume only declined by 0.4 percent.

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9. The Postal Service states that the “[i]n FY 2021, High-Quality Service will report Market Dominant Composite, which includes all First-Class Mail, [USPS] Marketing Mail, Periodicals, Flats, Bound Printed Matter Parcels, [USPS] Marketing Mail Parcels and Library/Media Mail. This metric replaces both the First-Class Mail Letter and Flat (FCLF) Composite and Marketing Mail and Periodicals Composite, which were reported in previous Annual Reports to Congress.” *Id.* at 33 n.3.
- a. Please confirm that the Postal Service will report FY 2021 targets and results for the Single-Piece First-Class Mail (2-Day and 3-5-Day), Presorted First-Class Mail (Overnight, 2-Day, 3-5-Day), and Market Dominant Composite performance indicators in the FY 2021 Annual Performance Report (*FY 2021 Report*). If not confirmed, please describe the performance indicators the Postal Service will include in the *FY 2021 Report*.
 - b. The *FY 2021 Report* must include comparable results for each performance indicator for, at a minimum, FYs 2018, 2019, 2020, and 2021. See 39 U.S.C. § 2804(c).
 - i. Please confirm that the *FY 2021 Report* will include comparable results for these fiscal years expressed using the Market Dominant Composite, FCLF Composite, or Market Mail and Periodicals Composite. If confirmed, please indicate which performance indicator(s) will express comparable results for these fiscal years.
 - ii. If not confirmed, please explain whether and how the Postal Service will explain why results are not directly comparable across FYs 2018, 2019, 2020, and 2021, and explain either: (1) how to compare results between the current and former methodologies; or (2) why making this comparison is not feasible. See *FY 2019 Analysis* at 16.

RESPONSE:

- a. Confirmed. The Postal Service will, as in previous years, report in the FY2021 Annual Performance Report the high-quality performance indicators found in its FY2021 Annual Performance Plan: Single-Piece First-Class, Presort First-Class, First-Class Mail Letter and Flat Composite, and Marketing Mail and Periodicals Composite.

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b.

i. Confirmed. The Postal Service already provided scores for FYs 2018, 2019, and 2020 for the Market Dominant Composite, FCLF Composite, and Marketing Mail and Periodicals Composite on page 33 of the FY 2020 Annual Report. The FY 2021 Report will include these indicators.

ii. Not applicable.

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- 10.** There have been numerous reports in the national media of increased issues with service, particularly for packages, during the holiday period in FY 2021.²
- a. Please describe the cause(s) of such difficulties.
 - b. Please explain whether and how the Postal Service factored these issues into the non-public High-Quality Service target that the Postal Service set for Competitive products in FY 2021.³
 - c. Please describe whether and how any issues with package tracking, service performance, and delivery during the holiday season will affect achievement of the High-Quality Service target for Competitive products in FY 2021.
 - d. Please describe the Postal Service's plans to address issues with package tracking, service performance, and delivery in FY 2021 and future years.

RESPONSE:

a. The Postal Service experienced unprecedented package volumes during the holiday period in FY 2021 due to the convergence of the holiday season with the increase in packages linked to the COVID-19 pandemic. In addition, the Postal Service received additional volumes because other delivery providers imposed volume limits on customers, whereas the Postal Service did not refuse packages tendered to us for delivery. The network was unable to support the increase in volume due to insufficient processing and staging space, processing capacity, and transportation capacity (both air and surface).

² See, e.g., Emily Badger, Quoc Trung Bui and Margot Sanger-Katz, *The Postal Service Survived the Election. But It Was Crushed by Holiday Packages*, The New York Times (January 19, 2021), available at: <https://www.nytimes.com/interactive/2021/01/19/upshot/postal-service-survived-election-but-crushed-by-holidays.html>.

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Flight reductions by commercial air carriers reduced capacity normally used to transport mail by air, forcing more of the volume onto cargo-only carriers. These carriers also saw increased volume of their own product, leading to competition for available space. Some of this was mitigated by holiday season air-to-surface diversions, but this also put greater strain on the surface transportation network. Surface transportation was also adversely affected by the pandemic's impact on driver availability.

In addition, the pandemic contributed to decreased employee availability. The number of seasonal employees was not enough to offset the decrease in availability of regular employees.

Rapid fluctuations in package volume are difficult to react to quickly in delivery operations. The sortation process is largely manual, requiring the onboarding of auxiliary personnel as well as processing space during peak periods. The pandemic continues to have a significant effect on both work force availability and daily parcel volume.

During the holiday season, the Postal Service was also affected by multiple winter storms in the Northeast.

³ Library Reference USPS-FY20-NP30, December 29, 2020, folder "USPS-FY20-NP30" file "NONPUBLIC Preface USPS-FY20-NP30.pdf."

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These factors contributed to a backlog of volume that could not be fully rectified until volumes receded. Major efforts were made to offload package volumes to various Processing and Distribution Centers throughout the country.

b. As of the filing of this response, the Competitive Service Targets for FY2021 have not been finalized.

c. All of the issues identified above can impact the Postal Service's ability to timely move package products; however, the Postal Service will do its best to improve service performance in FY 2021.

d. The Postal Service will continue its pre-pandemic efforts to improve service performance in FY 2021 and to build upon its FY 2020 efforts to deal with the effects of the pandemic. With respect to employee availability, the Postal Service will continue to work with organized labor to hire non-career employees to make up for career employees who become unavailable until the pandemic is brought under control. The Postal Service plans to continue using cargo aircraft and other alternatives until passenger aircraft become available. The Network Operations Control Centers (NOCCs) will be leveraged to perform real-time data analysis and communication with plants regarding issues of mail processing and transportation. The Postal Service is preparing a new strategic plan that will include new operating goals to increase operational precision and performance.

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- 11.** In the FY 2020 Annual Performance Plan (*FY 2020 Plan*),⁴ the Postal Service stated that it “will launch a new initiative in FY2020 called ‘Disruptive Events’ to identify mail affected by unforeseen events outside of management control.” *FY 2020 Annual Report* at 23. The Postal Service stated that “[t]he Disruptive Events program will enable us to more accurately quantify impacts from these events and diagnose service failures.” *Id.*
- a. Please describe the status of this initiative at the end of FY 2020.
 - b. Please explain how the Postal Service’s progress related to this initiative impacted High-Quality Service results in FY 2020.
 - c. For each impact identified in response to question 11.b., please provide quantitative support and identify the metric(s) used. If quantitative support is unavailable for an identified impact, please explain why it is unavailable and provide qualitative analysis in support of the identified impact.
 - d. Please explain whether any events in FY 2020 or FY 2021 have informed, or caused the Postal Service to make changes to, the Disruptive Events initiative. In the response, please describe the events and the changes made to the Disruptive Events initiative in response to these events.

RESPONSE:

- a. The Disruptive Events initiative was suspended due to resource constraints and competing priorities.
- b. Not applicable.
- c. Not applicable.
- d. Not applicable.

⁴ The *FY 2020 Plan* is included in the Postal Service’s FY 2019 *Annual Report to Congress*, which the Postal Service filed with the FY 2019 *Annual Compliance Report*. See *United States Postal Service FY 2019 Annual Report to Congress*, Library Reference USPS–FY19–17, December 27, 2019 (*FY 2019 Annual Report*).